



Pursuant to Local Rule 67.1, by Wednesday, December 11, 2024, Defendants are directed to file a proposed order reflecting the relief sought by their motion, see ECF No. 117.

Dated: December 9, 2024  
New York, New York

A handwritten signature in blue ink, appearing to read 'Dale E. Ho'.

Dale E. Ho  
United States District Judge

**Shane R. Heskin**

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December 5, 2024

Honorable Dale E. Ho, U.S.D.J.  
U.S.D.C. Southern District of New York  
500 Pearl Street  
New York, New York 10007

RE: *Brighthouse Life Insurance Co. v. Golden Foothill Insurance Services, LLC,*  
*et. al. Civil Action No. 1:23-cv-08570-DEH*

Dear Judge Ho:

Defendants Golden Foothill Insurance Services, LLC, Life Factor II, LLC, Life Shares II, LLC, El Dorado Hills Insurance Solutions, Inc., Lone Wolf Insurance Services, Inc., ELDO Investments, LLC, The Genesis LS Fund, LLC, KTL Holdings, Inc., DRVN Holdings, LLC, Stefan Leer and Tatanisha Leer (collectively known as the “Leer Defendants”) respectfully submit this letter to update Your Honor on recent settlement efforts. All parties engaged in a private mediation in November. Although unsuccessful, settlement discussions continue. In an effort to expedite those efforts, the Leer Defendants believe it would be helpful if the funds currently sitting in this Court’s escrow program were transferred to the state court receiver before the end of the year. The parties filed an unopposed joint motion for interpleader disbursement on May 30, 2024, which remains pending. [ECF 117]. Absent a resolution by the end of this calendar year, the Leer Defendants strongly believe that settlement discussions will fail and necessitate prolonged litigation in the state court action. In short, we believe there is a short window of opportunity to settle this matter, but it is closing rapidly.

We respectfully thank the Court for its consideration of this matter.

Respectfully submitted,

**WHITE AND WILLIAMS LLP**

/s/ Shane Heskin

Shane R. Heskin, Esq.

cc: All counsel of Record via PACER